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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION FIXING SCHEDULE WITH
RESPECT TO CLAIM NO. 77335 (TODD
GREENBERG)**

Related to Dkt. Nos. 9455 and 9646

**Regarding Objection Set for Hearing
April 28, 2021 at 10:00 a.m. (Pacific Time)**

1 This stipulation (the “**Stipulation**”) is hereby entered into between PG&E Corporation (“**PG&E**
2 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
3 (collectively, the “Debtors” and as reorganized pursuant to the Plan (as defined below), the
4 “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and
5 Todd Greenberg, on the other hand, by and through their respective counsel. The Reorganized Debtors
6 and Mr. Greenberg are referred to in this Stipulation collectively as the “Parties,” and each as a “Party.”
7 The Parties hereby stipulate and agree as follows:

8 **RECITALS**

9 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11
10 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy**
11 **Court**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant
12 to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

13 B. On October 21, 2019, Mr. Greenberg filed Claim No. 77335, asserted in the amount of
14 \$37,635.04 (the “**Claim**”).

15 C. On November 5, 2020, the Reorganized Debtors filed the *Fortieth Omnibus Objection*
16 *to Claims (No Liability / Passthrough Claims)* [Docket No. 9455] (the “**Omnibus Objection**”), which
17 sought to disallow and expunge the Claim.

18 D. On December 1, 2020, Mr. Greenberg filed the *Response by Todd Greenberg to the*
19 *Reorganized Debtors’ Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims)*
20 [Docket No. 9646] (the “**Response**”).

21 E. The Omnibus Objection and the Response came before the Bankruptcy Court for a
22 status conference on March 24, 2021 at 10:00 a.m. (Pacific Time). The Bankruptcy Court ordered the
23 Parties to meet and confer regarding motion practice, discovery, and scheduling an evidentiary hearing,
24 and to reappear at the omnibus hearing scheduled for April 28, 2021 at 10:00 a.m. (Pacific Time) (the
25 “**Hearing**”).

26 F. The Parties have met and conferred and desire to fix a schedule for resolution of the
27 Claim.
28

1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
4 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**
5 **TO ORDER, THAT:**

6 1. The Hearing shall be taken off calendar with respect to the Claim.

7 2. The Parties shall meet and confer regarding each Party's discovery requests. Discovery
8 shall be completed by June 16, 2021.

9 3. On or before June 30, 2021, the Reorganized Debtors shall file a further objection to the
10 Claim (the "**Objection**"), which shall function as a trial brief as set forth in the Bankruptcy Court's Trial
11 Scheduling Order.

12 4. On or before July 14, 2021, Mr. Greenberg shall file an opposition to the Objection, which
13 also shall function as a trial brief as set forth in the Bankruptcy Court's Trial Scheduling Order.

14 5. On or before July 21, 2021, the Reorganized Debtors may file a reply brief.

15 6. The Court shall hold a status and scheduling conference on July 28, 2021 at 10:00 a.m.
16 to select a date for an evidentiary hearing on the Claim.

17 7. Except as provided in this Order or subsequently agreed between the Parties, each Party
18 reserves all rights, substantive or procedural, concerning the Claim and the briefing thereon.

19 8. This Court shall retain jurisdiction to resolve any disputes or controversies arising from
20 this Order.

21 Dated: April 23, 2021

22 Dated: April 23, 2021

23 **KELLER BENVENUTTI KIM LLP**

24 **TRODELLA & LAPPING LLP**

25 /s/ Dara L. Silveira

26 /s/ Richard Lapping

27 Dara L. Silveira

28 Richard Lapping

*Attorneys for Debtors
 and Reorganized Debtors*

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